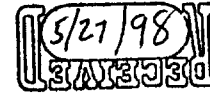




Melaleuca, Inc.

3910 South Yellowstone Hwy
Idaho Falls, Idaho 83402-6003
208 522-0700

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May 18, 1998

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, S.W.
Washington, DC 20204

Re: SECTION 403(r)(6) NOTIFICATION

Dear Sir or Madam:

In accordance with the requirements of section 403(r)(6) of the Federal Food, Drug and Cosmetic Act, Melaleuca, Inc., notifies FDA that it has begun using the following statements:

Glucosamine, a naturally occurring nutrient that helps maintain the health and proper function of joints.

Replenex assists in the process of maintaining the components necessary to keep joints healthy.

Glucosamine: For healthy joints.

Glucosamine: Your partner in supporting joint health.

The existence of this nutrient [glucosamine] assists the body's ability to replenish and maintain the building blocks of cartilage.

Glucosamine has also shown, through certain European studies, to help sustain the production of those components which provide natural support to the joints.

The supplemental glucosamine in Replenex assists the body in maintaining a natural supply of this important nutrient, allowing adequate production of the components that support healthy cartilage.

European studies have continuously shown glucosamine's ability to help maintain healthy joint function. For example, one study in 1980 compared 40 patients taking glucosamine with 40 patients taking a placebo (inactive pill). When cartilage samples were taken from a few of the patients, only those who had taken

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glucosamine showed cartilage that appeared more healthy and well-maintained.

Several other studies have been conducted, nearly all of them showing the positive effects glucosamine has on maintaining healthy joint function.

With Replenex, you can supply your body with the natural nutrient it needs to maintain joint cartilage: glucosamine.

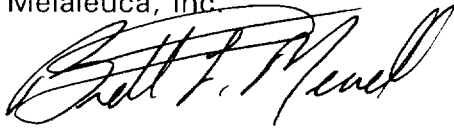
Replenex pitches in with a natural nutrient, supporting joint mobility and function in a way that works easily with the body's own systems. For keeping you active and comfortable, it's the best alternative available.

These statements contain the statutory disclaimer. The name of the dietary supplement is Replenex™, and the relevant dietary ingredient is glucosamine HCL.

I certify that the foregoing is complete and accurate, and that Melaleuca, Inc., has substantiation that the statements are truthful and not misleading.

Very truly yours,

Melaleuca, Inc.

A handwritten signature in black ink, appearing to read "Brett L. Merrell", written over a horizontal line.

Brett L. Merrell
V.P. Product Marketing